

Poole, Jill L. (Omaha)

From: thomas@strelkalaw.com
Sent: Wednesday, July 18, 2012 6:54 AM
To: Poole, Jill L. (Omaha)
Cc: leigh@strelkalaw.com
Subject: RE: Johnson v. Atlas

Jill,

We are steadily working through the discovery. I believe we may be able to get everything to you by the end of July. If we cannot get everything to you, you should certainly have most of it by then. Regarding the depositions, we are in a bit of a pickle. We will not have received your discovery responses by then and we feel that we would need that information for depositions. Also, we still have not received anything from the Union. I have contacted them asking for initial disclosures, but they have not responded. To put it simply, if this case continues we are most likely going to have to ask for another discovery extension. Given the Hopkins affidavit, we are going to need to depose a number of individuals from the Union and Atlas.

Were you planning on deposing all of our clients?

--Tom

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